

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
CHICAGO DIVISION

In re: ) CHAPTER: 13  
RICHARD T. MCGINNIS )  
DEBTOR ) CASE NO.: 20-03230-CAD  
 ) JUDGE: CAROL A. DOYLE  
 )

**NOTICE OF FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor Freedom Mortgage Corporation (“Creditor”), by and through undersigned counsel, and hereby submits Notice Forbearance to the Court of the Debtor's request for mortgage payment forbearance due to hardship caused by the COVID-19 pandemic.

The Debtor contacted Creditor requesting a forbearance period of three (3) additional months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting March 1, 2022 through May 1, 2022. Creditor has granted the Debtor's forbearance request. To the extent the forbearance period is not extended for an additional period of time as provided under the CARES Act, Debtor will resume mortgage payments beginning June 1, 2022. Near the end of the forbearance period, debtor, through counsel, will need to engage with creditor on a solution for payments suspended during the forbearance.

Creditor does not waive any rights to collect the payments that come due during the forbearance period. Furthermore, Creditor does not waive its rights under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

Creditor does not waive its rights to seek relief from the automatic stay for other reasons other than non-payment of the Mortgage, including, but not limited to, a lapse in insurance coverage or payment of property taxes.

Respectfully submitted,

By: /s/ Toni Townsend  
Toni Townsend  
*Counsel for Creditor*  
McCalla Raymer Leibert Pierce, LLC  
1 N. Dearborn Suite 1200  
Chicago, IL 60602

In Re:  
Richard T. McGinnis

Bankruptcy Case No.: 20-03230-CAD  
Chapter: 13  
Judge: Carol A. Doyle

CERTIFICATE OF SERVICE

I, Toni Townsend, of McCalla Raymer Leibert Pierce, LLC, 1 N. Dearborn Suite 1200, Chicago, IL 60602, certify:

That I am, and at all times hereinafter mentioned, was more than 18 years of age;

That on the date below, I caused to be served a copy of the within NOTICE OF FORBEARANCE AGREEMENT DUE TO THE COVID-19 PANDEMIC filed in this bankruptcy matter on the following parties at the addresses shown, by regular United States Mail, with proper postage affixed, unless another manner of service is expressly indicated:

Richard T. McGinnis  
9834 S. Dobson Avenue  
Chicago, IL 60628

David M Siegel  
David M. Siegel & Associates  
790 Chaddick Drive  
Wheeling, IL 60090

*(served via ECF Notification)*

Thomas H. Hooper, Trustee  
55 E. Monroe St, Ste 3850  
Chicago, IL 60603

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on: 10/28/2021 By: /s/ Toni Townsend  
(date) Toni Townsend  
Authorized Agent for Creditor